

# Buffalo Groves, Inc.

## USDA Grass & Range Fed Bison Meat

February 28<sup>th</sup>, 2003

Chief, Standardization Branch, Livestock and Seed Program  
Agricultural Marketing Service, United States Dept. of Agriculture  
Room 2603-S, Stop 0254, 1400 Independence Ave. S.W.  
Washington, DC 20250-0254

**Please refer to docket No. LS-02-02**

In reviewing the Meat Marketing claims outlined in Federal Register Vol. 67, No. 250, dated Dec. 30<sup>th</sup>, 2002; for "**Grass Fed Claims**", which states:

*Grass Fed - Grass, green or range pasture, or forage shall be 80% or more of the primary energy source throughout the animal's life cycle.*

I find the first portion of this statement to be very appropriate, which we restate as:

*Grass, green or range pasture, or forage.*

However I find the 80% completely inappropriate. Grass Fed should be NO LESS than 99%, which would then mean the animal was not:

- "crept-fed as a calf"
- "grain-fed at finishing"

Anything less than 99% leaves too much room for "Other Feed" *and other feed in it self is not Grass Fed.*

Let's put it another way... Say a consumer wants:

- Hormone Free Meat- would they be satisfied with 80% Hormone Free? Probably not.
- Sugar Free Food - would they be satisfied with 20% Sugar Added? Probably not.

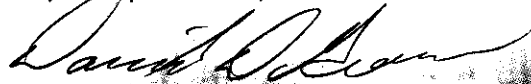
So, why then would we consider a claim of 20% non-grass to apply to Grass Fed?

- For a true Grass-Fed product, we need a statement, which is like the Antibiotic Statement of: "No Antibiotics used, or Raised without antibiotics - *Livestock have never received antibiotics from birth to harvest*".
- Equating it to a Grass Fed statement, it might be said as: "*No non-grass, green or range pasture or forage - Livestock have never received non-grass from birth to harvest*".

As a producer of "grass fed meat", we have many customers who are "allergic to corn and grains"... Therefore, **consumers must be assured meat they purchase that "says grass fed", really "means grass fed"**. Please do not allow for improper interpretation, misunderstanding, or marketing confusion when it comes to the meaning of grass fed. **Please make grass fed a minimum of 99% grass-fed.**

In the same document, in the area of "**Free Range Claims**", I ask you to add "buffalo" and/or "bison" as it now only included Cattle, Sheep and Swine.

Respectfully Submitted,



David Dean Groves, President



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